

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
SOUTHERN DIVISION**

DARRYL ANDERSON, et al.,	§	
	§	
Plaintiffs,	§	
	§	CIVIL ACTION NO.
v.	§	1:06-cv-1000-MEF
	§	
PERDUE FARMS, LLC.	§	
	§	
	§	
Defendant.	§	

NOTICE OF FILING ADDITIONAL CONSENTS TO JOIN

Plaintiffs give notice of filing the attached Notices of Consent to Join executed by ANGELA STRUM, LINDA POLLARD, ERICA WHIGAN and MAJOR POWELL, similarly situated employees to Plaintiffs, who likewise are or were subjected to the illegal pay practices at issue, and who wish to join the above captioned lawsuit.

Dated: August 13, 2007

Respectfully submitted,

THE COCHRAN FIRM, P.C.

/s/ Robert J. Camp

ROBERT J. CAMP

BERNARD D. NOMBERG

505 North 20th Street, Suite 825

Birmingham, AL 35203

(205) 930-6900 (Phone

(205) 930-6910 (Fax)

– and –

Samuel A. Cherry, Jr.
Lance H. Swanner
THE COCHRAN FIRM, P.C.
163 West Main Street
P. O. Box 927
Dothan, AL 36302
(334) 793-1555 (Phone)
(334) 793-8280 (Fax)

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2007 I electronically filed the above Notice with the Clerk of the District Court using CM/ECF System, which sent notification of such filing to:

Samuel A. Cherry
Attorney for Plaintiff
scherry@cochranfirm.com

Lance Harrison Swanner
Attorney for Plaintiff
lswanner@cochranfirm.com

Bernard D. Nomberg
Attorney for Plaintiff
bnomberg@cochranfirm.com

Robert J. Camp
Attorney for Plaintiff
rcamp@cochranfirm.com

James Kelley
Attorney for Defendant
jkelley@morganlewis.com

Sandra Reiss
Attorney for Defendant
Sandra.reiss@odnss.com

Richard B. Celler
Attorney for Plaintiff
Richard@cellarlegal.com

Brian Z. Liss
Attorney for Defendant
bliss@morganlewis.com

/s/ Robert J. Camp
ROBERT J. CAMP

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Angela Strum
[Print Name] states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at the facility located in Dothan, AL. I worked at this location from 8/04 to Present.
[Name of Plant]
[City/State]
[Date]
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan, AL, and possibly other plants owned by Perdue Farms. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.
[Name of Plant]
[City/State]
[Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 25 day of June, 2007.

ANGELA Strum
[PRINT NAME]

Angela Strum
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Linda Pollard [Print Name] states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms (E) at the facility located in Denton, NC. I worked at this location from 4, 1992 [City/State] to 9, 2004. [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Denton, NC, (E) [Name of Plant] and possibly other plants owned by Perdue Farms (E) [Name of Plant] If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 28 day of June, 2007.

Linda Pollard

Linda Pollard

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

ERICA Whigan

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at [Name of plant] the facility located in Dotson A1. I worked at this location from 2/25/05 to 11/24/07. [City/State] [Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dotson A1, and [Name of Plant] [City/State] possibly other plants owned by Perdue Farms [Name of Plant]. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 5^{15th day of May 2007.}

(EL)

Erica Whigan

Erica Whigan

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Major Powell
[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Percue Farms at the facility located in Dorwan, AL. I worked at this location from Oct 03 to Nov 06.
[Name of plant]
[City/State]
[Date]
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Percue Farms plant in Dorwan, AL, and possibly other plants owned by Percue Farms. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.
[Name of Plant]
[City/State]
[Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 23 day of Feb, 2007.

Major Powell
[PRINT NAME]

Major Powell
[SIGN NAME]